

**ORIGINAL**

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in The U.S.  
DISTRICT COURT at Seattle, Washington.

September 2 20 04  
By Bruce Rifkin Clerk  
[Signature] Deputy

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

MIRZA M. AKRAM, and,  
NAVEED MUHAMMAD KHAN,  
Defendants.

NO. **CR04 0399P**

INDICTMENT



04-CR-00399-INDI

The Grand Jury charges that:

COUNT 1

(Conspiracy to Commit Arson)

Beginning at a time unknown but during June 2004 and continuing to on or about July 9, 2004, at Everett, within the Western District of Washington, and elsewhere, MIRZA M. AKRAM and NAVEED MUHAMMAD KHAN, did knowingly and willfully conspire, agree, combine, and confederate with each other to commit arson of a building, Continental Spices Convenience Store located at 315 East Casino Road, Everett, Washington, in violation of Title 18, United States Code, Section 844(i).

In furtherance of the conspiracy one or more of the coconspirators committed the following acts:

1. On or about July 8, 2004, NAVEED MUHAMMAD KHAN rented a Ford Focus at Enterprise Rental Company in Bremerton, Washington.

2. On or about July 8, 2004, MIRZA M. AKRAM, poured gasoline on various contents through out the store, Continental Spices Convenience Store located at 315 East Casino Road, Everett, Washington.

3. On or about July 9, 2004, NAVEED MUHAMMAD KHAN lit the gasoline and set a fire inside the Continental Spices Convenience Store located at 315 East Casino Road, Everett, Washington.

All in violation of Title 18, United States Code, Section 844(n).

COUNT 2

(Arson)

On or about July 9, 2004, at Everett, within the Western District of Washington, MIRZA M. AKRAM and NAVEED MUHAMMAD KHAN, maliciously damaged, and attempted to damage and destroy, and aided and abetted in the damage and the destruction, by means of fire, a building, Continental Spices Convenience Store, located at 315 East Casino Road, Everett, Washington, used in interstate and foreign commerce and in activity affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2 and 844(i).

A TRUE BILL:

DATED: 09/02/04


  
FOREPERSON

  
JOHN MCKAY

United States Attorney

  
CARL BLACKSTONE

Assistant United States Attorney

  
BRUCE F. MIYAKE

Assistant United States Attorney